

BECKER LLC

Michael E. Holzapfel, Esq. (031022002)

354 Eisenhower Parkway, Suite 1500

Livingston, New Jersey 07039

(973) 251-8943

meholzapfel@becker.legal

Attorneys for Defendant Blue Cross Blue Shield of Michigan

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

RAHUL SHAH, M.D., on
assignment of Sheila H.

Plaintiff,

V.

BLUE CROSS BLUE SHIELD OF
MICHIGAN and HORIZON BLUE CROSS
BLUE SHIELD OF NEW JERSEY,

Defendants.

:
: Civil Case No.: 17-cv-711

: NOTICE OF MOTION FOR
: SUMMARY JUDGMENT

PLEASE TAKE NOTICE that on Monday, October 2, 2017 at 9:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Blue Cross Blue Shield of Michigan shall move before the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an order granting summary judgment in Defendant's favor and dismissing Plaintiff's complaint with prejudice pursuant to Fed. R. Civ. P. 56.

PLEASE TAKE FURTHER NOTICE that Defendant shall rely upon the accompanying brief and certifications in support of this motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

BECKER LLC
Attorneys for Defendant

By: /s/ Michael E. Holzapfel, Esq.
Michael E. Holzapfel

Dated: August 31, 2017